

# EXHIBIT N

June 19, 2020

**VIA EMAIL**

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Re: *Grae v. Corrections Corp. of America, et al.*, No. 3:16-cv-02267

Counsel:

Pursuant to the Court’s June 5 Order (the “Order”), attached as **Exhibit A** is log of documents that Defendants have submitted for the Court’s *in camera* review that includes “a field with the heading ‘Counsel Creating Privilege’” for all entries where Natasha Metcalf is “the only relevant counsel of legal staff” in the “Counsel and Legal Staff Involved in Communication” field. Attached as **Exhibit B** and **Exhibit C** are updated privilege and redaction logs that (i) include the information in the “Counsel Creating Privilege” field for the relevant documents; (ii) remove documents for which Defendants are no longer claiming privilege; and (iii) update the “Counsel and Legal Staff Involved in Communication” field for certain entries.

Upon receipt of the Order, Defendants engaged in another review of the universe of documents at issue. In an effort to minimize the burden upon the Court and to narrow the scope of the instant dispute, Defendants have withdrawn their privilege assertion over a number of documents identified in the Order. Shortly, you will be receiving a secure file transfer containing documents for which Defendants are no longer claiming privilege. These documents previously appeared on Defendants’ privilege or redaction log and identified Natasha Metcalf as the only person or entity in the “Counsel or Legal Staff Involved in Communication” field. This production will add to the more than 14,000 documents Defendants have produced previously in which Ms. Metcalf appears in the “Sent To,” “From” or “CC” fields.

LATHAM & WATKINS<sup>LLP</sup>

Please let us know if you would like to discuss further.

Best regards,  
  
Eric C. Pettis  
of LATHAM & WATKINS LLP

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Brian Glennon  
Sarah Tomkowiak  
Steve Riley  
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